

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**CIVIL DOCKET: 1:04-cv-10080-GAO**

RALPH VOLLMAN,  
Plaintiff,

v.

ROGER LYNN GRUBB and  
ALLIED SYSTEMS, LTD.  
Defendants.

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FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
2/8/05

**ASSENTED TO MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), the undersigned attorney, who is a member of the bar of this court, hereby respectfully moves the Court to permit Melissa Rotenberg Arcaro, Esq. of the law firm of Halloran & Sage LLP, One Goodwin Square, 225 Asylum Street, Hartford, CT 06103, to appear pro hac vice and to represent the defendant, Allied Systems, Ltd. and Roger Grubb, in all respects of this case, including trial. In support of this motion, the undersigned states the following:

1. Melissa Rotenberg Arcaro was admitted to practice law in the state of Connecticut in 1995. She was also admitted to practice before the United States District Court for the District of Connecticut in 1996.
2. Melissa Rotenberg Arcaro has not been denied admission or disciplined in accordance with Local Rule 85.5.3 by any court.

3. The undersigned states that he has conferred with Melissa Rotenberg Arcaro and that he understands and believes that Ms. Arcaro has read, and is familiar with, the Local Rules of the United States District Court for the District of Massachusetts.

4. Additionally, the undersigned respectfully states that he understands and believes that Melissa Rotenberg Arcaro and the law firm of Halloran & Sage LLP has a specialized knowledge of the defendants' affairs which is important to the defense of this action.

5. Finally, a signed affidavit of Melissa Rotenberg Arcaro is attached hereto as Exhibit A in support of this motion for the Court's convenience and consideration.

6. Counsel for the plaintiff does not object to this Motion.


WHEREFORE, the undersigned respectfully moves this honorable Court to allow Melissa Rotenberg Arcaro, Esq., to appear and to participate in this action pro hac vice, in all respects, and at trial.

REQUEST FOR ORAL ARGUMENT

The defendants respectfully request oral argument of this motion if deemed necessary by the Court.

Date: February 2, 2005

Respectfully submitted,

By:   
N. Kane Bennett of  
**HALLORAN & SAGE, LLP**  
One Goodwin Square  
225 Asylum Street  
Hartford, CT 06103  
(860) 522-6103  
BBO# 636731  
Attorney for the Defendant

CERTIFICATION PURSUANT TO LOCAL RULE 7.1


The undersigned attorney certifies that prior to filing the present motion, he conferred with plaintiff's counsel, Mr. Paul Nathan, by telephone and attempted in good faith to narrow or resolve this issue. The undersigned has determined that Attorney Nathan does not object to this motion.

  
N. Kane Bennett

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record of each party on February 2, 2005.

Paul Nathan, Esq.  
**Nathan & Pasquina**  
159 Derby Street  
Salem, MA 01970  
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